

MEMO

To: ABAG Executive Board

From: Paul Fassinger, ABAG Research Director

Date: January 4, 2007

Re: *Regional Housing Needs Allocation Methodology*

Recommendation

Staff recommends that the ABAG Executive Board adopt Resolution 02-07 authorizing the release of the Regional Housing Needs Allocation (RHNA) Methodology for the 2007-2014 period. The recommended methodology is reflective of the discussion at the November 18th Executive Board meeting and additional comments received during the public comment period. Staff recommendations are also inclusive of a January 4th, 2007 meeting of the Housing Methodology Committee held to review the alternatives described in this report.

The staff recommends that the Executive Board adopt a revised methodology that has less emphasis placed on transit than the draft RHNA methodology had (Alternative 2: Reduced Transit, as described below). In addition, staff recommends that the Board adopt a RHNA method that adjusts the income allocation to move jurisdictions from their current income distribution to a 175 percent adjustment toward the regional average distribution (Alternative 1: Percent Adjustment toward Regional Average, as described below). The staff also recommends that policies regarding spheres of influence be changed to reflect the agreement between the County of Marin and its cities. Staff also recommends that policies on transfers of units and sub regions should remain unchanged from the draft methodology.

On January 4th, the Housing Methodology Committee met to discuss alternative transit weights in the methodology and different scenarios for allocating units by income, as described in this memo. The committee members were divided in their support for the weighted factors. A slim majority of the members endorsed the existing draft allocation; however, there was also strong support for a “no transit” alternative, i.e. Alternative 3 described below. The draft allocation and the “no transit” alternatives are at the opposite ends of the spectrum in terms of a transit factor, and therefore have contrasting effects on the allocation. Many committee members endorsed the existing methodology as an expression of regional policy. The support for a no transit alternative came from the larger cities and developed suburbs. The larger cities countered that the allocation was too aggressive, and that the *Projections* forecast already promotes regional policies. They also commented that more mid-size cities in the region could do more to accommodate housing and that the responsibility should not be too heavily placed on relatively few cities. The lack of resources associated with developing housing, especially low income housing, was also cited as a reason the larger cities could not realistically accommodate the amount of housing assigned to them under the draft scenario. The staff recommendation for the reduced transit alternative is a balance between these two counter positions.

For allocating units by income, the HMC clearly supported the percentage adjustment toward the regional average. The committee believes that a method that considers existing income distributions in a community is appropriate to reduce existing concentrations of low-income households. Committee members also believe that the significant allocation that some of the larger cities will be getting in this RHNA cycle should be taken into consideration, as some of these same places are also where there are currently high concentrations of low income housing. Therefore, the committee felt that more should be done to account for existing concentrations of low income units. However, the committee members felt that the tiered adjustment proposal was too complex. Rather,

a significant majority supported a 175 percent adjustment toward the regional average, as this approach would weight rather heavily existing inequities in income distributions within an individual community, as opposed to the draft RHNA methodology.

Background

Comments received on the draft RHNA method were predominately on the weighted factors that allocate the total need and on the income allocation component of the methodology. For the factors allocating the total need, local jurisdictions have expressed concern with the use of both existing and planned transit as factors in the methodology. Some believe that this factor unfairly burdens those jurisdictions with either existing or planned transit, especially those cities with multiple transit stations. Staff has developed three alternative scenarios that include 1) existing transit only; 2) a reduced transit factor; and 3) no transit. This staff report describes these alternatives and the anticipated impact to local housing allocations.

Some local jurisdictions believe the proposed income allocation methodology does not do enough to alleviate existing concentrations of low-income households. There is concern that, because the draft recommendation assigns an “equal share” to each jurisdiction and does not take a jurisdiction’s existing income distribution into account, it unfairly burdens jurisdictions with existing high concentrations of low-income households. As a result, the draft method is perceived to perpetuate regional social and economic inequities. Staff has also developed three alternative income allocations. In contrast to the draft methodology, these alternative scenarios take into account existing income distributions within individual communities and attempt to address existing concentrations of low-income households. This staff report describes these alternative income allocations.

RHNA Methodology Recommendations & Alternatives

The regional housing needs allocation methodology is the tool used to assign each jurisdiction in the Bay Area its share of the region’s total housing need. The actual tool is a mathematical equation that consists of weighted factors. There are also a set of “rules” that dictate how units will be allocated by income, within spheres of influence, voluntary transfer of units, and subregions. The HMC’s recommendation encompasses these distinct components of the methodology.

In their recommendation, the HMC members considered local land use plans and policies, regional growth policies and the state’s housing policies, as expressed in the state mandated RHNA objectives. Additional information on how these recommendations were derived is contained in the attached report.

1. Weighted Factors

The HMC identified three broad categories of factors to be considered for inclusion in the RHNA methodology, including housing, employment and access to public transit (existing and planned).

Draft Recommendation

The weighted factors in the draft allocation methodology, as recommended by the HMC are:

- Household Growth, 40 percent;
- Employment Growth, 20 percent,
- Existing Employment, 20 percent
- Household Growth near Transit, 10 Percent;
- Employment Growth near Transit, 10 Percent

As expressed in the public comments received thus far, the transit component of this allocation scenario is a point of contention for many jurisdictions in the Bay Area. The HMC and ABAG staff agreed, however, that a factor that directs growth to areas with public transit could benefit the region. Growth near transit could improve

regional and interregional commuting, reduce vehicle miles traveled, and therefore lower carbon emissions and greenhouse gases.

In response to the concerns over the transit component of the allocation method, staff has developed three alternative scenarios. The alternative allocation scenarios remove planned transit, reduce the weight of the transit factor, and remove transit altogether as a factor in the methodology.

Alternative 1: Existing Transit Only

This scenario keeps the same weights for each factor as the draft method; however planned transit is removed from consideration - only existing transit is included.

Under this scenario, the weighted factors are:

- Household Growth, 40 percent;
- Employment Growth, 20 percent,
- Existing Employment, 20 percent
- Household Growth near Existing Transit, 10 Percent;
- Employment Growth near Existing Transit, 10 Percent

The effect of removing planned transit and only including existing transit is that jurisdictions with planned transit would see their allocation go down, compared to the draft allocation numbers. These jurisdictions include Brentwood, Antioch, Oakley, and the northern rural counties of Marin and Sonoma. Jurisdictions with existing transit, especially multiple transit stations, would see their allocation increase, including Oakland, San Francisco, Berkeley, El Cerrito, and San Leandro.

Alternative 2: Reduced Transit (Staff Recommendation)

This scenario reduces the weight of the transit factor in the methodology. In addition, planned transit is removed from consideration. Only existing transit stations, fixed rail and ferry, are included. As a result, household growth, existing jobs and employment growth receive a greater weight in the allocation formula.

Under this scenario, the weighted factors are:

- Household Growth, 45 percent;
- Employment Growth, 22.5 percent,
- Existing Employment, 22.5 percent
- Household Growth near Transit, 5 Percent;
- Employment Growth near Transit, 5 Percent

The effect of reducing transit's weight in the allocation and removing planned transit is that many jurisdictions with transit, including Oakland, San Francisco, Berkeley, Walnut Creek and similar cities, would see their allocations reduced over the draft method numbers. Allocations would go up in cities with high levels of expected household growth or where there are no or limited transit stations, including Brentwood, Antioch, Oakley, and the northern rural counties of Napa and Sonoma.

Because household growth is weighted more heavily in this scenario, jurisdictions with planned transit, their anticipated increase in household growth (household growth is weighted more heavily in this scenario) would offset any reduction that removing the planned transit option would have had. Therefore, most jurisdictions with planned transit would see their allocations go up over the draft allocation numbers. These jurisdictions include Brentwood, Antioch, and Oakley, and the northern rural counties of Sonoma.

Alternative 3: No Transit

This scenario removes transit from the allocation methodology. The effect is that household growth and employment would be given greater weight. The effect of removing transit would be that jurisdictions with transit, including Oakland, San Francisco, Berkeley, Walnut Creek and similar cities, would see their allocations reduced over the draft method numbers. Allocations would go up in cities with high levels of expected household growth or where there are no or few transit stations, including San Jose, Brentwood, Antioch, Oakley, and the northern rural counties of Napa, Marin and Sonoma.

Under this scenario, the weighted factors are:

- Household Growth, 50 percent;
- Employment Growth, 25 percent,
- Existing Employment, 25 percent

2. Regional Income Allocations

In the recommendation to the ABAG Executive Board, the HMC and ABAG staff proposed that each local jurisdiction plan for income-based housing units in the same ratio as the regional average income distribution. This is deemed an “equal share” approach because each jurisdiction would receive the same proportion of housing units in each affordability category (very-low, low, moderate, and above moderate). Although considered an equitable approach, this income allocation method does not consider existing concentrations of low-income households in a community. Based on 2000 Census figures, the regional income distribution is:

- **Very Low, 23 Percent**
Households with income up to 50 percent of the county’s area median income (AMI)
- **Low, 16 Percent**
Households with income between 50 and 80 percent of the county’s AMI
- **Moderate, 19 Percent**
Households with income between 80 and 120 percent of the county’s AMI
- **Above-Moderate, 42 Percent**
Households with income above 120 percent of the county’s AMI

Alternative 1: Percent Adjustment Toward Regional Average

By allocating each jurisdiction an equal share based on the regional income distribution, the draft allocation scenario moves each jurisdiction 100 percent toward the regional income distribution. It is focused on promoting an equitable regional distribution for future housing production, but does not consider existing concentrations of low-income households in a community or take steps to reduce them.

In contrast, the first two alternative income allocation scenarios give each jurisdiction either 150 or 175 percent of the difference between their 2000 household income distribution and the 2000 regional household income distribution.

The first step in this process is to determine the difference between the regional proportion of households in an income category and the jurisdiction’s proportion for that category. This difference is then multiplied by either 150 or 175 percent to determine an “adjustment factor.” Finally, this adjustment factor is added to the jurisdiction’s initial proportion of households in the income category, which results in the total share of the jurisdiction’s housing unit allocation that will be in that income category.

Using the 175 percent factor and the City of Oakland's very low income category as an example, 36 percent of households in Oakland were in this category, while the regional total was 23 percent.

City	Jurisdiction Proportion	Regional Proportion	Difference	Multiplier	Adjustment Factor	Total Share
Oakland	36	23	-13	175%	-23	13

The difference between 23 and 36 is -13. This is multiplied by 175 percent for a result of -22.75 (rounded to 23). This is then added to the city's original distribution of 36 percent, for a total share of 13 percent. A similar calculation for Piedmont, which has a relatively low proportion of households in the "very low" income category yields the following results:

City	Jurisdiction Proportion	Regional Proportion	Difference	Multiplier	Adjustment Factor	Total Share
Piedmont	9	23	14	175%	24	33

As shown above, those jurisdictions that have a larger proportion of households in an income category will receive a smaller allocation of housing units in that category. Conversely, those jurisdictions that have a relatively low proportion of households in a category would receive a higher allocation of housing units in that category.

The effect of these allocation scenarios is to change the income distribution in each jurisdiction to more closely match the regional distribution by taking both a jurisdiction's existing conditions and future development into account. By addressing existing concentrations of low-income households, these scenarios more aggressively promote an equitable regional income distribution. The multiplier determines how aggressively the scenario functions; the higher the multiplier, the more aggressive.

Alternative 2: Tiered Adjustment Based on Concentration of Low Income Households

The third alternative scenario is similar to the first two alternatives in that it uses existing conditions to move each jurisdiction closer to the regional income distribution. The key difference in this scenario is that jurisdictions are first separated into three groups based on the jurisdiction's proportion of low- and very low-income households compared to the proportion for the region. The three groups correspond to three different multipliers (like the 175 percent example used above) that determine how far a jurisdiction must move toward the regional income distribution.

The first step in this process is to add together the percentages of very low and low income households in a jurisdiction. Each jurisdiction's result is then compared to the regional proportion. Based on this comparison, jurisdictions are put into one of three categories:

- Low concentration: where less than 25 percent of total households have very low or low incomes.
- Moderate concentration: where more than 25 and less than 45 percent of total households have very low or low incomes.
- High concentration: where more than 45 percent of total households have very low or low incomes (San Pablo is the highest in the region at 65 percent).

Jurisdictions in the low concentration category, such as Livermore, Pleasanton, Clayton, Danville, and Los Altos Hills move the furthest (185 percent) toward the regional average. Those in the moderate concentration category, such as Albany, Walnut Creek, Napa, San Francisco, and San Jose, move 180 percent and those in the high concentration category, which includes Berkeley, Oakland, Richmond, San Rafael, Gilroy, and Sebastopol, move 175 percent.

Once the multiplier for the jurisdiction has been determined, the steps for determining the jurisdiction's share of housing units in each income category is the same as the one for the first alternative methodology described above.

Taking the City of Piedmont example used above, this scenario would result in a higher share of very low-income units for the city because the city falls into the low concentration category and has a multiplier of 185 percent. Here, the share is 35 percent compared to 33 percent in the example above.

City	Jurisdiction Proportion	Regional Proportion	Difference	Multiplier	Adjustment Factor	Total Share
Piedmont	9	23	14	185%	26	35

The result of this allocation scenario is that jurisdictions with a low concentration of low and very low income households get higher allocations of very low- and low-income housing units. Those jurisdictions that already have a high concentration of very low- and low-income households are allocated fewer units in these categories.

As in the first alternative scenario, the effect of this allocation scenario is to change the income distribution in each jurisdiction to more closely match the regional distribution by taking both a jurisdiction's existing conditions and future development into account. This third alternative scenario specifically looks at the proportion of very low- and low-income households in a jurisdiction as the factor for determining how far the jurisdiction must move toward the regional average income distribution.

3. Spheres of Influence

Each local jurisdiction with the land-use permitting authority in a "Sphere of Influence" should plan for the housing needed to accommodate housing growth, existing employment and employment growth in such "Sphere of Influence" areas. A 100 percent allocation of the housing need to the jurisdiction that has land use control over the area would ensure that the jurisdiction that plans for accommodating the housing units also receives credit for any built units during the RHNA period. In Marin, the cities and county have agreed to equally (50/50) share responsibility for units assigned to sphere's of influence areas.

4. Transfer of Units

After the initial allocation of the regional housing need, a local jurisdiction may request approval to transfer units with willing partner(s), in a way that maintains total need allocation amongst all transfer parties, maintains income distribution of both retained and transferred units, and includes package of incentives to facilitate production of housing units. This transfer rule would allow the transfer of allocated housing need between willing jurisdictions in conjunction with financial resources, while maintaining the integrity of the state's RHNA objectives by preventing any jurisdiction from abdicating its responsibility to plan for housing across all income categories. Transfers done in this manner may facilitate increased housing production in the region.

5. Subregions

The County of San Mateo, in partnership with all twenty cities in the county, has formed a subregion, as allowed by state statute. ABAG will assign a share of the regional need to the subregion "in a proportion consistent with the distribution of households" in Projections 2007. The subregion is then responsible for completing its own RHNA process that is parallel to, but separate from, the regional RHNA process. The subregion will create its own methodology, issue draft allocations, handle the revision and appeal processes, and then issue final allocations to the members of the subregion. The rules on how to handle the subregion allocation in the event the subregion fails are contained in the attached RHNA technical document.

Income Category Alternatives

	Existing Percentages Plus										Existing % into 3 Groups									
	Average Regional Percentage					150% Regional Average Minus Exist					175% Regional Average Minus Exist					Higher Existing Concentration Gets				
	Draft Allocation Proposal					150% Toward Regional Average					175% Toward Regional Average					Lower Allocation of Affordable				
	Very Low	Low	Mod	Above Mod	Very	Very Low	Low	Mod	Above Mod	Very	Very Low	Low	Mod	Above Mod	Very	Very Low	Low	Mod	Above Mod	Very
Total Need	<50%	<80%	<120%			<50%	<80%	<120%			<50%	<80%	<120%			<50%	<80%	<120%		
ALAMEDA	2,075	469	343	399	864	483	339	395	858	485	338	394	858	488	337	488	337	396	862	
ALBANY	262	59	43	50	109	61	42	49	111	61	41	49	112	61	41	61	41	49	112	
BERKELEY	2,714	614	449	521	1,130	448	468	579	1,218	361	479	608	1,266	362	479	612	479	612	1,272	
DUBLIN	3,440	778	569	661	1,432	1,013	648	666	1,115	1,121	690	669	960	1,171	706	674	706	674	901	
EMERYVILLE	1,537	348	254	295	640	283	243	293	716	249	239	293	757	250	239	295	239	295	761	
FREMONT	4,827	1,092	799	927	2,009	1,357	923	947	1,604	1,476	988	957	1,406	1,533	1,012	968	1,012	968	1,332	
HAYWARD	3,348	757	554	643	1,394	758	506	585	1,499	751	484	556	1,557	754	479	554	479	554	1,576	
LIVERMORE	3,423	774	567	657	1,425	958	636	674	1,157	1,040	673	682	1,028	1,080	686	690	686	690	979	
NEWARK	898	203	149	172	374	246	161	164	327	265	168	160	304	270	169	160	169	160	301	
OAKLAND	17,099	3,867	2,831	3,284	7,117	2,766	2,595	3,521	8,208	2,189	2,487	3,641	8,782	2,197	2,486	3,666	2,486	3,666	8,825	
PIEDMONT	37	8	6	7	16	11	8	9	9	12	10	10	5	13	10	11	10	11	4	
PLEASANTON	3,688	834	610	708	1,535	1,087	753	772	1,078	1,204	827	804	853	1,258	855	822	855	822	766	
SAN LEANDRO	1,874	424	310	360	780	423	280	330	841	419	267	315	874	420	263	314	263	314	885	
UNION CITY	2,011	455	333	386	837	539	382	389	702	576	408	390	637	587	413	393	413	393	626	
UNINCORPORATED	2,240	507	371	430	932	539	360	416	925	549	356	409	925	554	355	411	355	411	929	
ALAMEDA COUNTY	49,474	11,189	8,190	9,502	20,593	10,972	8,344	9,788	20,368	10,711	8,361	9,831	20,571	11,000	8,531	10,013	8,531	10,013	20,133	
ANTIOCH	2,302	521	381	442	958	521	357	400	1,023	516	347	380	1,059	518	344	378	344	378	1,071	
BRENTWOOD	2,807	635	465	539	1,168	708	458	509	1,132	738	457	493	1,118	748	456	494	456	494	1,120	
CLAYTON	145	33	24	28	60	42	30	30	42	47	33	31	33	49	35	32	35	32	30	
CONCORD	3,120	706	517	599	1,299	672	466	536	1,445	649	443	505	1,524	648	438	502	438	502	1,546	
DANVILLE	554	125	92	106	230	166	113	127	147	185	124	138	106	194	129	143	129	143	90	
EL CERRITO	522	118	86	100	217	114	77	97	233	112	73	96	242	112	72	96	72	96	245	
HERCULES	431	97	71	83	179	124	71	73	163	136	71	69	156	139	71	68	71	68	155	
LAFAYETTE	358	81	59	69	149	102	71	75	110	112	77	78	91	116	80	80	80	80	83	
MARTINEZ	1,046	236	173	201	435	251	168	183	444	255	166	174	449	258	166	174	166	174	452	
MORAGA	223	50	37	43	93	63	42	47	70	69	45	49	59	72	46	50	46	50	55	
OAKLEY	749	169	124	144	312	198	119	104	328	210	118	83	338	214	117	80	117	80	341	
ORINDA	221	50	37	42	92	64	45	51	61	70	49	55	46	73	51	57	51	57	40	
PINOLE	306	69	51	59	128	76	48	49	133	78	47	45	136	79	47	44	47	44	137	
PITTSBURG	2,022	457	335	388	842	397	283	352	989	363	259	334	1,066	365	258	336	258	336	1,072	
PLEASANT HILL	592	134	98	114	247	145	100	104	244	150	101	99	243	151	101	98	101	98	244	
RICHMOND	2,761	624	457	530	1,149	462	376	525	1,396	376	337	523	1,524	378	337	526	337	526	1,532	
SAN PABLO	283	64	47	54	118	35	40	56	152	20	37	57	169	20	37	57	37	57	170	
SAN RAMON	3,292	744	545	632	1,370	994	637	676	987	1,110	686	698	798	1,163	704	711	704	711	726	
WALNUT CREEK	2,208	499	365	424	919	510	351	420	927	510	346	417	935	513	344	420	344	420	940	
UNINCORPORATED	3,662	828	606	703	1,524	844	622	708	1,489	844	632	711	1,476	848	633	716	633	716	1,480	
CONTRA COSTA COUNTY	27,601	6,242	4,569	5,301	11,489	6,489	4,476	5,122	11,516	6,391	4,455	5,091	11,665	6,656	4,466	5,063	4,466	5,063	11,530	

Income Category Alternatives

	Existing Percentages Plus										Existing % into 3 Groups									
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	Very Low	Low	Mod	Above Mod		Very Low	Low	Mod	Above Mod		Very Low	Low	Mod	Above Mod		Very Low	Low	Mod	Above Mod	
Total Need	<50%	<80%	<120%			<50%	<80%	<120%			<50%	<80%	<120%			<50%	<80%	<120%		
BELVEDERE	25	4	5	10		7	5	6	7		7	6	6	6		7	6	6	6	
CORTE MADERA	232	38	44	96		61	37	44	90		64	37	43	88		65	37	43	88	
FAIRFAX	72	16	14	30		16	10	13	34		15	8	12	36		15	8	12	36	
LARKSPUR	612	138	118	255		142	93	119	258		143	90	119	260		144	89	120	262	
MILL VALLEY	278	63	53	116		68	50	60	100		70	52	64	92		70	52	65	91	
NOVATO	1,431	324	275	596		320	212	259	640		315	200	252	664		315	198	252	672	
ROSS	25	6	5	11		7	5	5	8		7	6	5	7		8	6	5	7	
SAN ANSELMO	108	24	21	45		24	18	20	45		24	18	20	45		24	18	20	45	
SAN RAFAEL	1,559	353	299	649		312	241	311	695		288	233	317	721		289	233	319	724	
SAUSALITO	178	40	34	74		46	32	35	65		48	33	36	61		49	33	36	60	
TIBURON	123	28	24	51		34	22	26	41		37	23	28	35		38	23	28	34	
UNINCORPORATED	683	155	131	284		160	119	142	263		161	122	148	253		162	123	150	252	
MARIN COUNTY	5,325	1,204	1,023	2,217		1,196	843	1,041	2,246		1,210	861	1,072	2,182		1,187	825	1,058	2,277	
AMERICAN CANYON	692	157	133	288		160	112	134	287		159	112	135	287		160	111	136	288	
CALISTOGA	90	20	15	37		17	12	17	43		16	10	17	46		16	10	18	46	
NAPA	1,917	433	368	798		439	294	361	823		438	283	357	839		440	280	359	846	
ST HELENA	116	26	19	48		28	20	23	45		28	20	24	43		29	21	24	43	
YOUNTVILLE	84	19	16	35		17	14	15	37		15	15	15	38		15	15	15	39	
UNINCORPORATED	625	141	120	260		163	109	123	231		173	112	124	217		175	113	125	215	
NAPA COUNTY	3,524	797	677	1,467		824	561	673	1,465		833	550	672	1,469		835	560	676	1,476	
SAN FRANCISCO COUNTY	40,494	9,158	6,703	7,778		8,759	7,061	8,387	16,285		8,477	7,268	8,695	16,055		8,464	7,301	8,816	16,080	
SAN MATEO COUNTY	18,270	4,132	3,024	3,509		4,132	3,024	3,509	7,605		4,292	2,930	3,382	7,667		4,302	2,923	3,374	7,671	
CAMPBELL	740	167	122	142		166	109	134	331		163	102	130	344		164	101	130	348	
CUPERTINO	1,112	252	184	214		300	208	224	381		322	220	229	342		328	222	231	335	
GILROY	1,585	358	262	304		328	231	277	749		310	216	263	796		311	216	265	800	
LOS ALTOS	302	68	50	58		85	59	69	89		92	64	74	71		96	66	77	64	
LOS ALTOS HILLS	77	17	13	15		23	17	19	19		25	19	21	12		26	19	22	10	
LOS GATOS	533	121	88	102		138	93	111	192		145	96	115	177		147	96	117	175	
MILPITAS	2,621	593	434	503		683	442	474	1,022		721	449	460	991		733	449	460	989	
MONTE SERENO	40	9	7	8		11	8	9	11		12	9	10	8		13	9	11	7	
MORGAN HILL	1,329	300	220	255		315	242	249	522		319	255	247	509		321	257	248	508	
MOUNTAIN VIEW	2,754	623	456	529		611	429	518	1,195		600	417	513	1,224		601	414	515	1,235	
PALO ALTO	3,716	840	615	714		879	679	789	1,370		889	714	827	1,286		896	720	840	1,275	
SAN JOSE	33,259	7,522	5,506	6,388		7,462	5,265	6,046	14,485		7,361	5,166	5,877	14,855		7,378	5,140	5,883	14,995	
SANTA CLARA	5,974	1,351	989	1,147		1,328	955	1,055	2,636		1,304	942	1,009	2,719		1,306	938	1,006	2,748	
SARATOGA	277	63	46	53		78	58	66	75		85	65	73	55		88	67	76	47	
SUNNYVALE	4,584	1,037	759	881		1,087	746	824	1,927		1,102	743	795	1,943		1,111	742	795	1,955	
UNINCORPORATED	160	36	26	31		35	26	32	67		34	26	33	67		34	26	33	68	
SANTA CLARA COUNTY	59,062	13,357	9,777	11,344		13,528	9,569	10,895	25,071		13,668	9,642	10,940	24,813		13,553	9,484	10,709	25,560	

Income Category Alternatives

	Average Regional Percentage					Existing Percentages Plus					Existing Percentages Plus					Existing % into 3 Groups				
	Draft Allocation Proposal					150% Regional Average Minus Exist					175% Regional Average Minus Exist					Higher Existing Concentration Gets Lower Allocation of Affordable				
						150% Toward Regional Average					175% Toward Regional Average					Tiered Adjustment				
	Very Low	Low	Mod	Above Mod		Very Low	Low	Mod	Above Mod		Very Low	Low	Mod	Above Mod		Very Low	Low	Mod	Above Mod	
	<50%	<80%	<120%			<50%	<80%	<120%			<50%	<80%	<120%			<50%	<80%	<120%		
BENICIA	505	114	84	97	210	132	91	100	183		139	95	102	170		141	96	103	168	
DIXON	692	157	115	133	288	177	101	121	293		186	95	116	296		188	93	115	298	
FAIRFIELD	3,665	829	607	704	1,526	839	568	665	1,594		836	550	645	1,634		840	546	646	1,649	
RIO VISTA	1,159	262	192	223	482	222	177	204	556		200	170	194	594		201	170	196	597	
SUNSHINE CITY	596	135	99	115	248	158	104	99	235		168	108	91	230		171	108	90	230	
VACAVILLE	2,758	624	456	530	1,148	686	451	499	1,121		711	451	484	1,111		720	450	485	1,114	
VALLEJO	3,094	700	512	594	1,288	669	485	572	1,367		648	474	561	1,411		647	471	563	1,426	
UNINCORPORATED	94	21	16	18	39	23	16	17	37		24	16	17	37		24	16	17	37	
SOLANO COUNTY	12,562	2,841	2,080	2,413	5,229	2,907	1,993	2,277	5,386		2,990	1,998	2,236	5,338		2,932	1,950	2,214	5,519	
CLOVERDALE	505	114	84	97	210	95	78	97	235		85	75	97	248		85	75	97	250	
COTATI	378	85	63	73	157	94	57	68	159		98	54	66	160		99	53	65	161	
HEALDSBURG	396	90	66	76	165	87	61	69	181		84	58	65	189		84	58	65	192	
PETALUMA	2,059	466	341	395	857	524	364	390	781		549	376	388	745		556	379	390	742	
ROHNERT PARK	1,897	429	314	364	790	445	294	341	816		449	286	329	832		453	284	329	839	
SANTA ROSA	6,673	1,509	1,105	1,282	2,778	1,539	1,053	1,183	2,899		1,540	1,031	1,134	2,969		1,548	1,025	1,131	2,996	
SEBASTOPOL	168	38	28	32	70	33	27	29	78		31	27	28	83		31	27	28	83	
SONOMA	336	76	56	64	140	71	54	65	145		68	53	65	148		68	53	66	150	
WINDSOR	699	158	116	134	291	181	123	133	262		191	128	132	248		194	128	133	247	
UNINCORPORATED	1,320	299	219	254	549	306	214	253	547		306	213	253	548		308	212	254	551	
SONOMA COUNTY	14,430	3,263	2,389	2,772	6,006	3,377	2,324	2,627	6,103		3,395	2,319	2,612	6,104		3,242	2,166	2,396	5,799	
REGION	230,743	52,183	38,197	44,319	96,044	52,183	38,197	44,319	96,044		52,183	38,197	44,319	96,044		52,166	38,151	44,327	96,098	

	Draft Allocation	1 Existing TOD Less TOD	2 Existing TOD	3 No TOD
	40% HH Growth 20% Job Growth 20% 2007 Jobs 10% TOD Housing 10% TOD Jobs	45% HH Growth 22.5% Job Growth 22.5% 2007 Jobs 5% TOD Housing 5% TOD Jobs	40% HH Growth 20% Job Growth 20% 2007 Jobs 10% TOD Housing 10% TOD Jobs	50% HH Growth 25% existing Jobs 25% Job Growth
ALAMEDA	2,075	2,177	2,114	2,241
ALBANY	262	295	262	328
BERKELEY	2,714	2,691	2,802	2,580
DUBLIN	3,440	3,656	3,488	3,824
EMERYVILLE	1,537	1,431	1,614	1,247
FREMONT	4,827	4,668	4,578	4,759
HAYWARD	3,348	3,541	3,409	3,672
LIVERMORE	3,423	3,655	3,473	3,837
NEWARK	898	967	909	1,026
OAKLAND	17,099	15,873	17,933	13,813
PIEDMONT	37	42	37	47
PLEASANTON	3,688	3,712	3,785	3,639
SAN LEANDRO	1,874	1,835	1,942	1,729
UNION CITY	2,011	2,078	2,056	2,099
UNINCORPORATED	2,240	2,361	2,281	2,441
ALAMEDA COUNTY	49,474	48,983	50,684	47,283
ANTIOCH	2,302	2,440	2,169	2,711
BRENTWOOD	2,807	2,892	2,571	3,213
CLAYTON	145	163	145	181
CONCORD	3,120	3,281	3,179	3,383
DANVILLE	554	623	554	692
EL CERRITO	522	463	554	373
HERCULES	431	485	431	539
LAFAYETTE	358	378	364	392
MARTINEZ	1,046	1,140	1,055	1,226
MORAGA	223	250	223	278
OAKLEY	749	828	736	921
ORINDA	221	232	225	240
PINOLE	306	345	306	383
PITTSBURG	2,022	1,893	1,777	2,009
PLEASANT HILL	592	666	592	740
RICHMOND	2,761	3,000	2,788	3,212
SAN PABLO	283	318	283	353
SAN RAMON	3,292	3,703	3,292	4,115
WALNUT CREEK	2,208	2,229	2,271	2,186
UNINCORPORATED	3,662	3,689	3,377	4,001
CONTRA COSTA COUNTY	27,601	29,020	26,890	31,150
BELVEDERE	25	28	25	31
CORTE MADERA	232	261	232	290

	Draft Allocation	1 Existing TOD Less TOD	2 Existing TOD	3 No TOD
	40% HH Growth 20% Job Growth 20% 2007 Jobs 10% TOD Housing 10% TOD Jobs	45% HH Growth 22.5% Job Growth 22.5% 2007 Jobs 5% TOD Housing 5% TOD Jobs	40% HH Growth 20% Job Growth 20% 2007 Jobs 10% TOD Housing 10% TOD Jobs	50% HH Growth 25% existing Jobs 25% Job Growth
FAIRFAX	72	81	72	90
LARKSPUR	612	515	576	454
MILL VALLEY	278	312	278	347
NOVATO	1,431	1,327	1,180	1,475
ROSS	25	28	25	32
SAN ANSELMO	108	121	108	135
SAN RAFAEL	1,559	1,493	1,327	1,658
SAUSALITO	178	190	180	200
TIBURON	123	131	125	136
UNINCORPORATED	683	761	677	846
MARIN COUNTY	5,325	5,248	4,803	5,693
AMERICAN CANYON	692	779	692	866
CALISTOGA	90	101	90	112
NAPA	1,917	2,156	1,917	2,396
ST HELENA	116	130	116	145
YOUNTVILLE	84	94	84	105
UNINCORPORATED	625	704	625	782
NAPA COUNTY	3,524	3,964	3,524	4,404
SAN FRANCISCO COUNTY	40,494	35,365	42,836	27,894
SAN MATEO COUNTY	18,270	18,270	18,270	18,270
CAMPBELL	740	832	740	925
CUPERTINO	1,112	1,251	1,112	1,390
GILROY	1,585	1,716	1,602	1,830
LOS ALTOS	302	339	302	377
LOS ALTOS HILLS	77	87	77	96
LOS GATOS	533	600	533	667
MILPITAS	2,621	2,570	2,406	2,734
MONTE SERENO	40	44	40	49
MORGAN HILL	1,329	1,402	1,350	1,455
MOUNTAIN VIEW	2,754	2,915	2,802	3,029
PALO ALTO	3,716	3,790	3,813	3,766
SAN JOSE	33,259	34,906	32,610	37,203
SANTA CLARA	5,974	5,816	5,662	5,969
SARATOGA	277	312	277	347
SUNNYVALE	4,584	4,725	4,686	4,764
UNINCORPORATED	160	169	163	175
SANTA CLARA COUNTY	59,062	61,474	58,174	64,774

	Draft Allocation	1 Existing TOD Less TOD	2 Existing TOD	3 No TOD
	40% HH Growth 20% Job Growth 20% 2007 Jobs 10% TOD Housing 10% TOD Jobs	45% HH Growth 22.5% Job Growth 22.5% 2007 Jobs 5% TOD Housing 5% TOD Jobs	40% HH Growth 20% Job Growth 20% 2007 Jobs 10% TOD Housing 10% TOD Jobs	50% HH Growth 25% existing Jobs 25% Job Growth
BENICIA	505	569	505	632
DIXON	692	779	692	865
FAIRFIELD	3,665	4,065	3,679	4,451
RIO VISTA	1,159	1,304	1,159	1,448
SUISUN CITY	596	636	605	666
VACAVILLE	2,758	3,102	2,758	3,447
VALLEJO	3,094	3,312	3,139	3,484
UNINCORPORATED	94	105	94	117
SOLANO COUNTY	12,562	13,871	12,631	15,111
CLOVERDALE	505	445	396	495
COTATI	378	275	244	306
HEALDSBURG	396	354	315	394
PETALUMA	2,059	2,064	1,835	2,293
ROHNERT PARK	1,897	1,661	1,477	1,846
SANTA ROSA	6,673	6,986	6,210	7,763
SEBASTOPOL	168	189	168	210
SONOMA	336	377	336	419
WINDSOR	699	710	631	788
UNINCORPORATED	1,320	1,485	1,320	1,650
SONOMA COUNTY	14,430	14,547	12,931	16,163
REGION	230,743	230,743	230,743	230,743